# FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

## Styline Industries, Inc. Styline Plant #7 114 East Third Huntingburg, Indiana 47542

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 037-6254-00079 Issuance Date: December 9, 1996 Expiration Date: December 9, 2001

Operation Permit No.: F037-13920-00079

Original signed by Paul Dubenetzky

Issued by:

Paul Dubenetzky, Branch Chief

Office of Air Quality

Issuance Date: August 1, 2001

Expiration Date: August 1, 2006

Styline Industries, Inc. Huntingburg, Indiana Permit Reviewer: PMC/MES Page 2 of 37 OP No. F 037-13920-00079

#### **TABLE OF CONTENTS**

SECTIO	ON A	SOURCE SUMMARY 5
	A.1	General Information [326 IAC 2-8-3(b)]
	A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
	A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
	A.4	FESOP Applicability [326 IAC 2-8-2]
	A.5	Prior Permit Conditions
	Λ.υ	Thorremit conditions
SECTIO		GENERAL CONDITIONS
	B.1	Permit No Defense [IC 13]
	B.2	Definitions [326 IAC 2-8-1]
	B.3	Permit Term [326 IAC 2-8-4(2)]
	B.4	Enforceability [326 IAC 2-8-6]
	B.5	Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]
	B.6	Severability [326 IAC 2-8-4(4)]
	B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
	B.8	Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]
	B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]
	B.10	Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]
	B.11	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
	B.12	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
	B.13	Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]
	B.14	Emergency Provisions [326 IAC 2-8-12]
	B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
	B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination
	B.17	Permit Renewal [326 IAC 2-8-3(h)]
	B.18	Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]
	B.19	Operational Flexibility [326 IAC 2-8-15]
	B.20	Permit Revision Requirement [326 IAC 2-8-11.1]
	B.21	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]
	B.22	Transfer of Ownership or Operational Control [326 IAC 2-8-10]
	B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]
SECTIO	ON C	SOURCE OPERATION CONDITIONS
	Emissi	on Limitations and Standards [326 IAC 2-8-4(1)]
	C.1	Overall Source Limit [326 IAC 2-8]
	C.2	Opacity [326 IAC 5-1]
	C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]
	C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
	C.5	Fugitive Dust Emissions [326 IAC 6-4]
	C.6	Operation of Equipment [326 IAC 2-8-5(a)(4)]
	C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]
	Testine	g Requirements [326 IAC 2-8-4(3)]
	C.8	Performance Testing [326 IAC 3-6]
	Compl	iance Requirements [326 IAC 2-1.1-11]
	C.9	Compliance Requirements [326 IAC 2-1.1-11]

Styline Industries, Inc. Huntingburg, Indiana Permit Reviewer: PMC/MES Page 3 of 37 OP No. F 037-13920-00079

	Compl	iance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]
	C.10	Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
	C.11	Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]
	C.12	Monitoring Methods [326 IAC 3] [40 CFR 60][40 CFR 63]
	C.13	Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
	0.10	[326 IAC 2-8-5(1)]
		tive Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]
	C.14	Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
	C.15 C.16	Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4, 5] Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4, 5]
	Record	d Keeping and Reporting Requirements [326 IAC 2-8-4(3)]
	C.17	General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
	C.18	General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]
	Stratos	spheric Ozone Protection
	C.19	Compliance with 40 CFR 82 and 326 IAC 22-1
SECTI	ON D.1	FACILITY OPERATION CONDITIONS: Coal-fired boiler
		on Limitations and Standards [326 IAC 2-8-4(1)]
	D.1.1	Particulate Matter Limitation (PM) [326 IAC 6-1-2]
	D.1.2	PM <sub>10</sub> [326 2-8-4]
	Compl	iance Determination Requirements
	D.1.3	Visible Emissions Notations
SECTI	ON D.2	FACILITY OPERATION CONDITIONS: Spray Booths B-1 through B-5
	Emissi	ion Limitations and Standards [326 IAC 2-8-4(1)]
	_	
	D.2.1	Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8]
	D.2.2	Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8] Volatile Organic Compounds (VOC) Limits [326 IAC 2-8]
	D.2.2 D.2.3	Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8] Volatile Organic Compounds (VOC) Limits [326 IAC 2-8] Particulate Matter (PM) [326 IAC 6-3-2]
	D.2.2 D.2.3 D.2.4	Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8] Volatile Organic Compounds (VOC) Limits [326 IAC 2-8] Particulate Matter (PM) [326 IAC 6-3-2] Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
	D.2.2 D.2.3 D.2.4 D.2.5	Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8] Volatile Organic Compounds (VOC) Limits [326 IAC 2-8] Particulate Matter (PM) [326 IAC 6-3-2] Volatile Organic Compounds (VOC) [326 IAC 8-2-12] PM <sub>10</sub> [326 2-8-4]
	D.2.2 D.2.3 D.2.4	Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8] Volatile Organic Compounds (VOC) Limits [326 IAC 2-8] Particulate Matter (PM) [326 IAC 6-3-2] Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
	D.2.2 D.2.3 D.2.4 D.2.5 D.2.6	Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8] Volatile Organic Compounds (VOC) Limits [326 IAC 2-8] Particulate Matter (PM) [326 IAC 6-3-2] Volatile Organic Compounds (VOC) [326 IAC 8-2-12] PM <sub>10</sub> [326 2-8-4] Preventive Maintenance Plan [326 IAC 2-8-4(9)]  iance Determination Requirements
	D.2.2 D.2.3 D.2.4 D.2.5 D.2.6 Compl D.2.7	Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8]  Volatile Organic Compounds (VOC) Limits [326 IAC 2-8]  Particulate Matter (PM) [326 IAC 6-3-2]  Volatile Organic Compounds (VOC) [326 IAC 8-2-12]  PM <sub>10</sub> [326 2-8-4]  Preventive Maintenance Plan [326 IAC 2-8-4(9)]  iance Determination Requirements  Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)
	D.2.2 D.2.3 D.2.4 D.2.5 D.2.6 Compl D.2.7 D.2.8	Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8]  Volatile Organic Compounds (VOC) Limits [326 IAC 2-8]  Particulate Matter (PM) [326 IAC 6-3-2]  Volatile Organic Compounds (VOC) [326 IAC 8-2-12]  PM <sub>10</sub> [326 2-8-4]  Preventive Maintenance Plan [326 IAC 2-8-4(9)]  iance Determination Requirements  Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)  Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) Emissions
	D.2.2 D.2.3 D.2.4 D.2.5 D.2.6 Compl D.2.7	Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8]  Volatile Organic Compounds (VOC) Limits [326 IAC 2-8]  Particulate Matter (PM) [326 IAC 6-3-2]  Volatile Organic Compounds (VOC) [326 IAC 8-2-12]  PM <sub>10</sub> [326 2-8-4]  Preventive Maintenance Plan [326 IAC 2-8-4(9)]  iance Determination Requirements  Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)
	D.2.2 D.2.3 D.2.4 D.2.5 D.2.6 Compl D.2.7 D.2.8 D.2.9	Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8]  Volatile Organic Compounds (VOC) Limits [326 IAC 2-8]  Particulate Matter (PM) [326 IAC 6-3-2]  Volatile Organic Compounds (VOC) [326 IAC 8-2-12]  PM <sub>10</sub> [326 2-8-4]  Preventive Maintenance Plan [326 IAC 2-8-4(9)]  iance Determination Requirements  Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)  Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) Emissions
	D.2.2 D.2.3 D.2.4 D.2.5 D.2.6 Compl D.2.7 D.2.8 D.2.9 Compl D.2.10	Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8]  Volatile Organic Compounds (VOC) Limits [326 IAC 2-8]  Particulate Matter (PM) [326 IAC 6-3-2]  Volatile Organic Compounds (VOC) [326 IAC 8-2-12]  PM <sub>10</sub> [326 2-8-4]  Preventive Maintenance Plan [326 IAC 2-8-4(9)]  iance Determination Requirements  Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)  Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) Emissions  Particulate Matter (PM)  iance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

Page 4 of 37 OP No. F 037-13920-00079

SECTION D.	FACILITY OPERATION CONDITIONS: Woodworking Operations	28
Emis	sion Limitations and Standards [326 IAC 2-8-4(1)]	
D.3.1	Particulate Matter (PM) [326 IAC 6-3-2]	
D.3.2	PM <sub>10</sub> [326 2-8-4]	
D.3.3	Preventive Maintenance Plan [326 IAC 2-8-4(9)]	
Com	pliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]	
D.3.4	Particulate Matter (PM)	
D.3.5	Visible Emissions Notations	
D.3.6	Baghouse Inspections	
D.3.7	Broken or Failed Bag Detection	
Reco	rd Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]	
D.3.8	Record Keeping Requirements	
Certification		30
Emergency	Occurrence Report	31
Quarterly Re	ports	33
Quarterly De	viation and Compliance Monitoring Report	36

Styline Industries, Inc.

Page 5 of 37
Huntingburg, Indiana

OP No. F 037-13920-00079

Permit Reviewer: PMC/MES

#### **SECTION A**

#### **SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

#### A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary wood furniture manufacturing source.

Authorized Individual: Ray Brooks

Source Address: 114 East Third, Huntingburg, Indiana 47542 Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542

General Source Phone Number: 812-683-7165

SIC Code: 2521 Source Location Status: Dubois

County Status: Attainment for all criteria pollutants

Source Status: Federally Enforceable State Operating Permit (FESOP)

Minor Source, PSD Rules;

Minor Source, Section 112 of the Clean Air Act

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) underfeed screw stoker coil-fired boiler, exhausted to S2, installed in 1963, rated at 1.67 million British thermal units per hour.
- (b) Five (5) spray booths, known as B-1 through B-5, installed in 1990, exhausted to S3, S4, S6, S8a, S8b and S10, each equipped with dry filters for PM overspray control, capacity: 4.8 furniture parts per hour each.
- (c) One (1) woodworking area, equipped with a baghouse, exhausted to S11, capacity: 894 pounds of wood, medium density flakeboard and flakeboard per hour.

#### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour.

#### A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP) Renewal.

#### A.5 Prior Permit Conditions

(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

Styline Industries, Inc. OP No. F 037-13920-00079 Huntingburg, Indiana Permit Reviewer: PMC/MES

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

Page 6 of 37

Permit Reviewer: PMC/MES

#### **SECTION B**

#### **GENERAL CONDITIONS**

#### B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

#### B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

#### B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

#### B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

#### B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

#### B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

#### B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM,

Styline Industries, Inc.

Page 8 of 37

Huntingburg, Indiana

OP No. F 037-13920-00079

Permit Reviewer: PMC/MES

OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

#### B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

#### B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

#### B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

#### B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification covered the time period from the date of the first original final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Styline Industries, Inc.

Page 9 of 37
Huntingburg, Indiana

OP No. F 037-13920-00079

Permit Reviewer: PMC/MES

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification:
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

#### B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

#### B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contem-

Styline Industries, Inc.

Page 10 of 37

Huntingburg, Indiana

OP No. F 037-13920-00079

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

poraneous operating logs or other relevant evidence that describes the following:

- (2) The permitted facility was at the time being properly operated;
- Ouring the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ / Southwest Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)

or,

Permit Reviewer: PMC/MES

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

Southwest Regional Office Telephone No.: 812-436-2570 Facsimile No.: 812-436-2572

Failure to notify IDEM, OAQ and Southwest Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Permit Reviewer: PMC/MES

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

#### B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Styline Industries, Inc.

Page 12 of 37

Huntingburg, Indiana

OP No. F 037-13920-00079

Permit Reviewer: PMC/MES

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

### B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

#### B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Styline Industries, Inc.

Page 13 of 37

Huntingburg, Indiana

OP No. F 037-13920-00079

Permit Reviewer: PMC/MES

Request for renewal shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
  - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9] If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

#### B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

#### B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions

Styline Industries, Inc.

Page 14 of 37

Huntingburg, Indiana

OP No. F 037-13920-00079

Permit Reviewer: PMC/MES

is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Styline Industries, Inc.

Page 15 of 37

Huntingburg, Indiana

OP No. F 037-13920-00079

Permit Reviewer: PMC/MES

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

#### B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed 326 IAC 2 and 326 IAC 2-8-11.1.

#### B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

#### B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Styline Industries, Inc.

Page 16 of 37

Huntingburg, Indiana

OP No. F 037-13920-00079

Permit Reviewer: PMC/MES

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

#### B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

#### **SECTION C**

#### **SOURCE OPERATION CONDITIONS**

#### **Entire Source**

#### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD).
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

Styline Industries, Inc.

Page 18 of 37

Huntingburg, Indiana

OP No. F 037-13920-00079

Permit Reviewer: PMC/MES

#### C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

#### C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

#### C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Asbestos Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Styline Industries, Inc.

Page 19 of 37

Huntingburg, Indiana

OP No. F 037-13920-00079

Permit Reviewer: PMC/MES

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 1410-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet

on all facility components.

is federally enforceable.

(f) Indiana Accredited Asbestos Inspector The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited pursuant to the provisions of 40 CFR 61, Subpart M,

#### Testing Requirements [326 IAC 2-8-4(3)]

#### C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### Compliance Requirements [326 IAC 2-1.1-11]

#### C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon permit issuance. If required by Section D, the

Page 20 of 37 OP No. F 037-13920-00079

Huntingburg, Indiana Permit Reviewer: PMC/MES

Styline Industries, Inc.

Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

#### C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

#### C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

### C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

#### Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68,

including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

#### C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

Styline Industries, Inc.

Page 22 of 37

Huntingburg, Indiana

OP No. F 037-13920-00079

Permit Reviewer: PMC/MES

- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

#### C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

#### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

#### C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

Styline Industries, Inc.

Page 23 of 37
Huntingburg, Indiana

OP No. F 037-13920-00079

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
  - Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

#### **Stratospheric Ozone Protection**

Permit Reviewer: PMC/MES

#### C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

Styline Industries, Inc. Huntingburg, Indiana

Permit Reviewer: PMC/MES

#### SECTION D.1

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) underfeed screw stoker coil-fired boiler, exhausted to S2, installed in 1963, rated at 1.67 million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (b)(3), particulate emissions from the coal-fired boiler, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input, equivalent to 1.00 pound per hour.

#### D.1.2 PM<sub>10</sub> [326 IAC 2-8-4]

Any change or modification which may increase potential to emit  $PM_{10}$  from the entire source to one hundred (100) tons per year or more shall require approval from IDEM, OAQ prior to making the change.

#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.1.3 Visible Emissions Notations

- (a) Visible emission notations of stack S2 exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

#### **SECTION D.2**

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-8-4(10)]:

(b) Five (5) spray booths, known as B-1 through B-5, installed in 1990, exhausted to S3, S4, S6, S8a, S8b and S10, each equipped with dry filters for PM overspray control, capacity: 4.8 furniture parts per hour each.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8-4]

- (a) An individual HAP delivered to the coating applicators in B-1 through B-5 shall not exceed a total of nine (9) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 are not applicable.
- (b) The combination of HAPs delivered to the coating applicators in B-1 through B-5 shall be less than a total of 24.0 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 are not applicable.

#### D.2.2 Volatile Organic Compounds (VOC) Limit [326 IAC 2-8-4]

The volatile organic compounds (VOCs) delivered to the applicators including cleanup solvents shall be limited to less than 99.0 tons per twelve (12) consecutive month period. Therefore, this limit and the potential to emit of VOCs from the insignificant activities makes the requirements of 326 IAC 2-7 not applicable.

#### D.2.3 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a) PM emissions from B1 through B-5 shall be limited to the following shall not exceed 0.03 grains per dry standard cubic foot of air.

#### D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

Styline Industries, Inc.

Page 26 of 37

Huntingburg, Indiana

OP No. F 037-13920-00079

Permit Reviewer: PMC/MES

#### D.2.5 PM<sub>10</sub> [326 IAC 2-8-4]

Any change or modification which may increase potential to emit  $PM_{10}$  from the entire source to one hundred (100) tons per year or more shall require approval from IDEM, OAQ prior to making the change.

#### D.2.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

#### **Compliance Determination Requirements**

#### D.2.7 Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP usage limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

#### D.2.8 VOC and HAP Emissions

Compliance with Condition D.2.1 and D.2.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

#### D.2.9 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when B-1 through B-5 are in operation.

#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.2.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S3, S4, S6, S8a, S8b and S10 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.2.11 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in

Styline Industries, Inc.

Page 27 of 37

Huntingburg, Indiana

OP No. F 037-13920-00079

Permit Reviewer: PMC/MES

#### Condition D.2.2 and D.2.2.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) The cleanup solvent usage for each month;
- (4) The total VOC usage for each month; and
- (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

#### D.2.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

#### **SECTION D.3**

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-8-4(10)]:

(c) One (1) woodworking area, equipped with a baghouse, exhausted to S11, capacity: 894 pounds of wood, medium density flakeboard and flakeboard per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.3.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a) the PM emissions from the woodworking operations shall not exceed 0.03 grains per dry standard cubic foot of outlet air, equivalent to 4.47 pounds per hour at a flow rate of 17,400 dry standard cubic feet per minute.

#### D.3.2 PM<sub>10</sub> [326 IAC 2-8-4]

Any change or modification which may increase potential to emit  $PM_{10}$  from the entire source to one hundred (100) tons per year or more shall require approval from IDEM, OAQ prior to making the change.

#### D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.3.4 Particulate Matter (PM)

The baghouse for PM control shall be in operation and control emissions from the woodworking operations at all times that the woodworking operation is in operation.

#### D.3.5 Visible Emissions Notations

- (a) Daily visible emission notations of stack S11 exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.

Styline Industries, Inc.

Page 29 of 37

Huntingburg, Indiana

OP No. F 037-13920-00079

Permit Reviewer: PMC/MES

#### D.3.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

#### D.3.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.3.8 Record Keeping Requirements

- (a) To document compliance with Condition D.3.5, the Permittee shall maintain records of daily visible emission notations of stack S11 exhaust.
- (b) To document compliance with Condition D.3.6, the Permittee shall maintain records of the results of the inspections required under Condition D.3.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

Styline Industries, Inc.

Page 30 of 37

Huntingburg, Indiana

OP No. F 037-13920-00079

Permit Reviewer: PMC/MES

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE BRANCH

### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Styline Industries, Inc.

Source Address: Styline Plant #7, 114 East Third, Huntingburg, Indiana 47542

Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542

FESOP No.: F 037-13920-00079

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.
Please check what document is being certified:
9 Annual Compliance Certification Letter
9 Test Result (specify)
9 Report (specify)
9 Notification (specify)
9 Affidavit (specify)
9 Other (specify)
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

Styline Industries, Inc.

Page 31 of 37

Huntingburg, Indiana

OP No. F 037-13920-00079

Permit Reviewer: PMC/MES

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

COMPLIANCE BRANCH 100 North Senate Avenue P.O. Box 6015 Indianapolis, Indiana 46206-6015 Phone: 317-233-5674 Fax: 317-233-5967

### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) EMERGENCY OCCURRENCE REPORT

Source Name: Styline Industries, Inc.

Source Address: Styline Plant #7, 114 East Third, Huntingburg, Indiana 47542

Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542

FESOP No.: F 037-13920-00079

If any of the following are not applicable, mark N/A

#### This form consists of 2 pages

Page 1 of 2

9	This is an emergency as defined in 326 IAC 2-7-1(12)
	CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-
	451-6027 or 317-233-5674, ask for Compliance Section); and
	CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile
	Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

any of the following are not applicable, mark N/A	Page 2 of 2
Date/Time Emergency started:	
Date/Time Emergency was corrected:	
Was the facility being properly operated at the time of the emergency? Y N Describe:	
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:	
Estimated amount of pollutant(s) emitted during emergency:	
Describe the steps taken to mitigate the problem:	
Describe the corrective actions/response steps taken:	
Describe the measures taken to minimize emissions:	
If applicable, describe the reasons why continued operation of the facilities are nece imminent injury to persons, severe damage to equipment, substantial loss of capital loss of product or raw materials of substantial economic value:	
Form Completed by:	
Title / Position:	
Date:	

A certification is not required for this report.

Phone:

Page 33 of 37 OP No. F 037-13920-00079

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE BRANCH

#### **FESOP Quarterly Report**

Source Name:	Styline Industries, Inc.	
--------------	--------------------------	--

Source Address: Styline Plant #7, 114 East Third, Huntingburg, Indiana 47542

Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542

FESOP No.: F 037-13920-00079

Facility: Spray Booths B-1 through B-5

Parameter: VOC

Limit: Less than 99.0 tons of VOC per twelve (12) consecutive month period.

YEAR: \_\_\_\_\_

	VOC (tons)	VOC (tons)	VOC (tons)
Month	This Month	Previous 11 Months	12 Month Total

9	No (	deviation	occurred	ın	this	quarter.
---	------	-----------	----------	----	------	----------

9	Deviation/s occurred in this quarter. Deviation has been reported on:
Submit	ted by:
Title / F	Position:
Signati	ıre:
Date:	
Phone:	

Attach a signed certification to complete this report.

Page 34 of 37 OP No. F 037-13920-00079

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE BRANCH

#### **FESOP Quarterly Report**

Source Name:	Styline Industries, I	nc.

Source Address: Styline Plant #7, 114 East Third, Huntingburg, Indiana 47542

Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542

FESOP No.: F 037-13920-00079

Facility: Spray Booths B-1 through B-5

Parameter: Worst Case Single HAP

Limit: Less than nine (9.0) tons per consecutive twelve (12) month period

YEAR:	

Month	Worst Case Single HAP	Worst Case Single HAP	Worst Case Single HAP
	This Month	Previous 11 Months	12 Month Total

9	No deviation occurred in this quarter.
9	Deviation/s occurred in this quarter.  Deviation has been reported on:
Submitted by:	
Title / Position:	
Signature:	
Date:	
Phone:	

Attach a signed certification to complete this report.

Page 35 of 37 OP No. F 037-13920-00079

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE BRANCH

#### **FESOP Quarterly Report**

Source Name:	Styline Industries, Inc.

Source Address: Styline Plant #7, 114 East Third, Huntingburg, Indiana 47542

Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542

FESOP No.: F 037-13920-00079

Facility: Spray Booths B-1 through B-5

Parameter: Combination of HAPs

Limit: Less than 24.0 tons per consecutive twelve (12) month period for any combination of

HAPs.

YEAR:	

Month	Combination of HAPs	Combination of HAPs	Combination of HAPs
	This Month	Previous 11 Months	12 Month Total

9	No deviation occurred in this quarter.
9	Deviation/s occurred in this quarter.  Deviation has been reported on:
Submitted by:	
Title / Position:	
Signature:	
Date:	
Phone:	

Attach a signed certification to complete this report.

Page 36 of 37 OP No. F 037-13920-00079

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE BRANCH

### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Styline Industries, Inc.
Source Address: Styline Plant #7, 114 East Third, Huntingburg, Indiana 47542
Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542
FESOP No.: F 037-13920-00079

Months: to	Year:	
	Page 1 of 2	
This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".		
9 NO DEVIATIONS OCCURRED THIS REPORTIN	IG PERIOD.	
9 THE FOLLOWING DEVIATIONS OCCURRED T	HIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)		
Date of Deviation:	Duration of Deviation:	
Number of Deviations:		
Probable Cause of Deviation:		
Response Steps Taken:		
Permit Requirement (specify permit condition #)		
Date of Deviation:	Duration of Deviation:	
Number of Deviations:		
Probable Cause of Deviation:		
Response Steps Taken:		

Styline Industries, Inc. Huntingburg, Indiana Permit Reviewer: PMC/MES Page 37 of 37 OP No. F 037-13920-00079

Page 2 of 2

Permit Requirem	ent (spe	ecify permit condition #)	
Date of Deviation	n:		<b>Duration of Deviation:</b>
Number of Devia	tions:		
Probable Cause	of Devia	ation:	
Response Steps	Taken:		
Permit Requirem	ent (spe	ecify permit condition #)	
Date of Deviation	n:		<b>Duration of Deviation:</b>
Number of Devia	tions:		
Probable Cause	of Devia	ation:	
Response Steps	Taken:		
Permit Requirem	ent (spe	ecify permit condition #)	
Date of Deviation	n:		<b>Duration of Deviation:</b>
Number of Devia	tions:		
Probable Cause	of Devia	ation:	
Response Steps	Taken:		
	9	No deviation occurred in	this quarter.
	9	Deviation/s occurred in to Deviation has been repo	his quarter. orted on:
	Form C	completed By:	_
	Title/Po	osition:	
	Date:		

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management Office of Air Quality

#### Addendum to the

Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

Source Name: Styline Industries, Inc.

Source Location: Styline Plant #7, 114 East Third, Huntingburg, Indiana 47542

County: Dubois SIC Code: 2521

Operation Permit No.: F 037-13920-00079
Permit Reviewer: Paula M. Cognitore

On June 16, 2001, the Office of Air Quality (OAQ) had a notice published in the Herald, Jasper, Indiana, stating that Styline Industries, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate wood furniture source with a baghouse. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On July 10, 2001 Ray Brooks of Styline Industries, Inc. submitted comments on the proposed FESOP. The comments are as follows: The permit language, if changed, has deleted language as strikeouts and new language **bolded.** 

#### Comment 1:

Why does the Annual Compliance Certification (B.12) not show EPA Region V as an addressee?

#### Response 1:

The OAQ has evaluated that it is no longer required to send a copy of the Annual Compliance Certification to EPA Region V.

#### Comment 2:

While going through the FESOP for another of our plants, which is also going through FESOP Renewal, I noted that the requirements there where based on 326 IAC 6-3-2. I feel that this allows for more accurate reporting based on known hard data factors. Is there any reason why the same cannot be used for this plant?

#### Response 2:

This source is located in Dubois County which makes it subject to 326 IAC 6-1-9. Although this source is not specifically listed in 326 IAC 6-1-9 it is subject to 326 IAC 6-1-2 because the potential to emit PM from this source is greater than 100 tons per year. Based on rule applicability this source is not subject to 326 IAC 6-3-2.

Upon further review, the OAQ has decided to make the following changes to the FESOP: The permit language is changed to read as follows (deleted language appears as strikeouts, new language is **bolded)**:

Styline Industries, Inc.

Page 2 of 2
Huntingburg, Indiana

OP No. F 037-13920-00079
Permit Reviewer: PMC/MES

#### Change 1

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) underfeed screw stoker coil-fired boiler, exhausted to S2, installed in 1963, rated at 1.67 million British thermal units per hour.
- (b) Five (5) spray booths, known as B-1 through B-5, installed in 1990, exhausted to S3, S4, S6, S8a, S8b and S10, each equipped with dry filters for PM overspray control, capacity: 4.8 furniture parts per hour each.
- (c) One (1) woodworking area, equipped with a baghouse, exhausted to S11, capacity: 894 pounds of wood, MDF medium density flakeboard and flakeboard per hour.

#### SECTION D.3

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-8-4(10)]:

(c) One (1) woodworking area, equipped with a baghouse, exhausted to S11, capacity: 894 pounds of wood, MDF medium density flakeboard and flakeboard per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Change 2

#### B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

# Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

#### **Source Background and Description**

Source Name: Styline Industries, Inc.

Source Location: Styline Plant #7, 114 East Third, Huntingburg, Indiana 47542

County: Dubois SIC Code: 2521

Operation Permit No.: F 037-13920-00079
Permit Reviewer: Paula M. Cognitore

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Styline Industries, Inc. relating to the operation of a wood furniture source. The original FESOP 037-6254 issued on December 9, 1996 expires on December 9, 2001.

#### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) underfeed screw stoker coil-fired boiler, exhausted to S2, installed in 1963, rated at 1.67 million British thermal units per hour.
- (b) Five (5) spray booths, known as B-1 through B-5, installed in 1990, exhausted to S3, S4, S6, S8a, S8b and S10, each equipped with dry filters for PM overspray control, capacity: 4.8 furniture parts per hour each.
- (c) One (1) woodworking area, equipped with a baghouse, exhausted to S11, capacity: 894 pounds of wood, MDF and flakeboard per hour.

#### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

#### New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no new facilities proposed at this source during this review process.

#### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour.

Styline Industries, Inc.

Page 2 of 11
Huntingburg, Indiana

F 037-6254-00079

Permit Reviewer: PMC:MES

#### **Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

- (a) F 037-6254-00079, issued on December 9, 1996,
- (b) SSM to a FESOP 037-6254-00079, issued on August 5, 1997; and
- (c) Exemption 037-9916-00079, issued on August 26, 1998.

All conditions from previous approvals were incorporated into this FESOP except the following:

(1) F 037-6254-00079, issued on December 9, 1996

#### Condition C.1:

#### Overall Source Limit (326 IAC 2-8)

Pursuant to 326 IAC 2-8, emissions of any regulated pollutant from the entire source shall not exceed 99 tons per 365 day period. Emissions of hazardous air pollutants (HAP) from the entire source shall not exceed 9 tons per 365 day period for any individual HAP of 24 tons per 365 day period of any combination of HAPs. Emissions shall include those from all emission points at the source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, as long as the total emissions from the source do not exceed the above specified limits. In the event that any condition or combination of conditions in Section D of this permit differs from the above, the most restrictive limit will prevail.

Condition C.1 has been changed as follows:

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD).
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

Styline Industries, Inc.

Page 3 of 11
Huntingburg, Indiana

F 037-6254-00079

Permit Reviewer: PMC:MES

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

(2) F 037-6254-00079, issued on December 9, 1996

Condition D.2.1(a):

The volatile organic compounds (VOC)delivered to the applicators including cleanup solvents shall not exceed 8.25 tons per month. Therefore, the requirements of 326 IAC 2-7 do not apply.

Condition D.2.1(a) has been changed as follows:

The volatile organic compounds (VOC)delivered to the applicators including cleanup solvents shall not exceed 99.0 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 are not applicable.

(3) F 037-6254-00079, issued on December 9, 1996

Condition D.2.2 Hazardous Air Pollutants

The hazardous air pollutant emissions shall be limited as follows:

- (a) The amount of any single hazardous air pollutant (HAP) delivered to the applicators shall not exceed 0.75 tons per month.
- (b) The amount of any combination of HAPs delivered to the applicators shall not exceed 2.00 tons per month.

Therefore, the requirements of 326 IAC 2-7 do not apply.

This Condition has been changed to the following:

#### D.1.1 Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8]

- (a) An individual HAP delivered to the coating applicators in B-1 through B-5 shall not exceed a total of nine (9) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 are not applicable.
- (b) The combination of HAPs delivered to the coating applicators in B-1 through B-5 shall be less than a total of 24.0 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 are not applicable.
- (4) F 037-6254-00079, issued on December 9, 1996

Condition D.2.8 (d)

40 CFR 63, Subpart JJ (Wood Furniture and Cabinet Coating) record keeping requirements are satisfied by 326 IAC 2-8-5.

This source is not subject to 40 CFR 63, Subpart JJ (Wood Furniture and Cabinet Coating) because the source is limited to less than ten (10) tons per year of a single HAP and twenty-five (25) tons per year for any combination of HAPs.

Styline Industries, Inc.

Page 4 of 11
Huntingburg, Indiana

F 037-6254-00079

Permit Reviewer: PMC:MES

(5) F 037-6254-00079, issued on December 9, 1996

Condition D.1.1

#### D.1.1 Particulate Matter

Pursuant to 326 IAC 6-2-3, the particulate matter (PM) emissions shall be limited to 0.8 pounds per million British thermal units heat input.

This Condition has been changed to the following:

#### D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (b)(3), particulate emissions from the coal-fired boiler, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input, equivalent to 1.00 pound per hour.

The Condition has been changed to correct an error in applicability.

(6) F 037-6254-00079, issued on December 9, 1996

Condition D.3.1

#### D.3.1 Particulate Matter

Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter (PM) emissions from the woodworking operations shall not exceed 2.39 pounds per hour.

The Condition has been changed to the following:

#### D.3.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a) the PM emissions from the woodworking operations shall not exceed 0.03 grains per dry standard cubic foot of outlet air, equivalent to 4.47 pounds per hour at a flow rate of 17,400 dry standard cubic feet per minute.

The Condition has been changed to correct an error in applicability.

#### **Enforcement Issue**

There are no enforcement actions pending.

#### Recommendation

The staff recommends to the Commissioner that the FESOP renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP renewal application for the purposes of this review was received on February 14, 2001. The application was received timely, more than nine (9) months before the December 9, 2001 expiration of the original FESOP.

#### **Emission Calculations**

See pages 1 through 3 of Appendix A of this document for detailed emissions calculations.

Styline Industries, Inc. Huntingburg, Indiana

Permit Reviewer: PMC:MES

#### **Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE after controls since all control equipment was required in the FESOP issued on December 9, 1996. The table also reflects the PTE after all FESOP limitations.

Pollutant	Potential To Emit (tons/year)
PM	45.4
PM <sub>10</sub>	4.68
SO <sub>2</sub>	12.7
VOC	less than 100
СО	8.38
NO <sub>X</sub>	7.92

Note: For the purpose of determining Title V applicability for particulates, PM<sub>10</sub>, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Xylene	less than 10.0
Toluene	less than 10.0
Formaldehyde	0.662
MEK	less than 10.0
MIBK	3.82
Glycol Ethers	3.18
Methanol	less than 10.0
Methylene Chloride	less than 10.0
Chromium	0.011
Arsenic	0.004
Lead	0.004
TOTAL	less than 25.0

Permit Reviewer: PMC:MES

This source, otherwise required to obtain a Title V permit, agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source was issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8. The source will continue to comply with the requirements of 326 IAC 2-8, FESOP.

#### **Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1995 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	not listed
PM <sub>10</sub>	not listed
SO <sub>2</sub>	not listed
VOC	14.0
СО	not listed
NO <sub>X</sub>	not listed
Total HAPs	6.45

#### **Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

			Limite	d Potential (tons/year)	to Emit		
Process/facility	PM	PM <sub>10</sub>	SO <sub>2</sub>	voc	СО	NO <sub>x</sub>	HAPs
Coal Boiler	4.39	4.39	11.7	0.015	3.38	2.92	0.021
Paint Booths	1.76	1.76	0.00	less than 99.0	0.00	0.00	Single less than 9.0 Total less than 24.0
Woodworking	19.6	19.6	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	1.0	1.0	1.0	0.985	5.0	5.0	0.979
Total Emissions	26.8	26.8	12.7	less than 100	8.38	7.92	Single less than 10 Total less than 25

Styline Industries, Inc.

Page 7 of 11
Huntingburg, Indiana

F 037-6254-00079

Permit Reviewer: PMC:MES

Notes: The PM value for the coal-fired boiler represents the allowable hourly PM emission rate of 0.6 pounds per million British thermal units pursuant to 326 IAC 6-1-2, equivalent to 1.00 pound per hour, equivalent to 4.39 tons per year.

The PM value for the woodworking represents the allowable PM emission rate of 0.03 grains per dry standard cubic foot of exhaust air pursuant to 326 IAC 6-1, equivalent to 4.47 pounds of PM per hour, equivalent to 19.6 tons of PM per year.

#### **County Attainment Status**

The source is located in Dubois County.

Pollutant	Status
PM <sub>10</sub>	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
СО	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen ( $NO_X$ ) are precursors for the formation of ozone. Therefore, VOC and  $NO_X$  emissions are considered when evaluating the rule applicability relating to the ozone standards. Dubois County has been designated as attainment or unclassifiable for ozone.
- (b) Dubois County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

#### **Federal Rule Applicability**

- (a) The one (1) coal-fired boiler, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.40, 40 CFR 60.40b and 40 CFR 60.40c, Subparts, Da, Db and Dc because it was installed prior to September 18,1978 and has a capacity less than 10.0 million British thermal units per hour.
- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart JJ because the source is limited to less than ten (10) tons per year for any single HAP and less than twenty five (25) tons per year for any combination of HAPs.

#### State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Dubois County and the potential to emit any criteria pollutant is less than one hundred (100) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential to emit  $PM_{10}$  is less than one hundred (100) tons per year, including fugitive emissions,

Styline Industries, Inc.

Page 8 of 11
Huntingburg, Indiana

F 037-6254-00079

Permit Reviewer: PMC:MES

therefore, 326 IAC 2-6 does not apply.

#### 326 IAC 2-8-4 (FESOP)

- (a) Pursuant to this rule, the amount of  $PM_{10}$ ,  $SO_2$ , VOC, CO and  $NO_X$  shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply.
- (b) Any change or modification which may increase potential to emit PM<sub>10</sub>, SO2, CO and/or NOx from the entire source to one hundred (100) tons per year or more shall require approval from IDEM, OAQ prior to making the change.

#### 326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### State Rule Applicability - Individual Facilities

326 IAC 6-1-2 (Nonattainment area particulate limitations)

Since none of the facilities at Styline Industries are specifically listed in 326 IAC 6-1-9 (Non-attainment area particulate limitations: Dubois County), then pursuant to 326 IAC 6-1-2:

(a) The woodworking and spray booths shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter equivalent to 0.03 grains per dry standard cubic foot, equivalent to 4.47 pounds per hour at a flow rate of 17,400 dry standard cubic feet per minute, equivalent to 19.6 tons per year.

The particulate matter emissions from the woodworking operations are controlled by a baghouse exhausting through stack S11. Therefore these emissions are subject to the 0.03 grains per dry standard cubic foot allowable emission requirement of this rule. The outlet grain loading for the baghouse is 0.0000335 grains per dry standard cubic foot, therefore the baghouse exhaust complies with this rule.

(b) Particulate emissions from the coal-fired boiler shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input, equivalent to 1.00 pounds of PM per hour. Styline Industries, Inc.

Page 9 of 11
Huntingburg, Indiana

F 037-6254-00079

Permit Reviewer: PMC:MES

#### 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Since the potential  $SO_2$  emissions from the coal-fired boiler are less than twenty-five (25) tons per year and less than ten (10) tons per hour the requirements of 326 IAC 7-1.1 are not applicable.

326 IAC 8-2-12 (Wood furniture and cabinet coating)

The surface coating operations are subject to the requirements of 326 IAC 8-2-12 since the coatings are being applied to solid wood or wood composition. The existing HVLP spray applicators used in the painting operation comply with this rule.

#### State Rule Applicability - Insignificant Activities

There are no rules for the insignificant activities listed.

#### **Testing Requirements**

No testing is required for the spray booths B-1 through B-5 based on the MSDS for each material.

#### **Compliance Requirements**

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The previous compliance monitoring requirements applicable to this source are kept as follows:

- (a) The baghouse used for control on the woodworking operations has applicable compliance monitoring conditions as specified below:
  - (1) Daily visible emissions notations of the woodworking stack exhaust shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Re-

Styline Industries, Inc.

Page 10 of 11
Huntingburg, Indiana

F 037-6254-00079

Permit Reviewer: PMC:MES

sponse Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

- (2) An inspection shall be performed each calender quarter of all bags controlling the operations at this source when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (3) In the event that bag failure has been observed:
  - (A) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion.
  - (B) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B Emergency Provisions).
- (b) The dry filters used for control in spray booths B1 through B5 have applicable compliance monitoring conditions as specified below:
  - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for B-1 through B-5. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while B-1 through B-5 is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
  - (2) Monthly inspections shall be performed of the coating emissions from the spray booth stack exhausts, known as Stacks S3, S4, S6, S8a, S8b and S10, for the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit..
  - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Styline Industries, Inc.

Huntingburg, Indiana

Page 11 of 11
F 037-6254-00079

Permit Reviewer: PMC:MES

The baghouse and dry filters must operate properly to ensure compliance with 326 IAC 6-1-2 and 326 IAC 2-8 (FESOP).

#### Conclusion

The operation of this wood furniture manufacturing source shall be subject to the conditions of the attached proposed FESOP Renewal No.: F 037-13920-00079.

### Appendix A: Emissions Calculations Coal combustion: Underfeed Stoker

**Company Name:** Styline Industries Inc.

City, Indiana: Styline Plant #7 114 East Third, Huntingburg, IN 47542

**FESOP:** 037-13920 **Plant ID:** 037-00079

Reviewer: Paula M. Cognitore
Date: February 14, 2001

Heat Input Capacity	Heat Content of Co	oal Potential Throughput	Weight %
MMBtu/hr	Btu/lb of Coal	_ tons/year	Sulfur in Fuel
1.67	11,914	614	S = 0.89 %
1.54	0.04.40	40440 Dr. /	

Annual Btu usage: 0.0146 x 10^12 Btu/yr

#### Pollutant

		i oliatani				
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/ton	15.0	6.20	38.0	9.5	0.05	11.00
			(38S)			
Potential Emission in tons/yr	4.60	1.90	11.7	2.92	0.015	3.38
	Chromium	Formaldehyde	Arsenic	Lead		
Emission Factor in lb/10^12 Btu	1570.0	221.00	542.0	507.0		
Potential Emission in tons/yr	0.011	0.002	0.004	0.004		

<sup>\*</sup>The PM emission factor is filterable PM only. The PM10 emission factor is filterable and condensable PM10 combined.

VOC emission factor is from Table 1.1-19 (Total non-methane organic carbon).

Potential Throughput (tons/year) = Heat Input Capacity (MMBtu/hr) x 10^6 Btu/MMBtu / Heat Content of Coal (Btu/lb) / 2000 lb/ton x 8,760 hr

Emission Factors from Fire 6.22, AP-42, Chapter 1.1 for industrial overfeed stoker SCC 1-02-002-05/25 (Supplement E, 9/98)

Additional emission factors for commercial/institutional and electric generation boilers are available in AP-42, Chapter 1.1.

Emission (tons/yr) = Throughput tons per year x Emission Factor (lb/ton) / 2,000 lb/ton

Emissions (lbs/MMBtu) = 10^6 Btu/MMBtu / Heat Content of Coal (Btu/lb) / 2000 lb/ton x Emission Factor (lb/ton)

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

<sup>\*\*</sup>PM is limited by 326 IAC 6-1-18 limits for this facility.

#### Appendix A: Federal Potential Emissions Calculations VOC, HAP and Particulate

From Surface Coating Operations

Company Name: Styline Industries - Plant #7

Address City IN Zip: Styline Plant #7 114 East Third Street, Huntingburg, IN 47542

FESOP: F 037-13920 PIt ID: 039-00079 Reviewer: Paula M. Cognitore Date: February 14, 2001

VOC and Particulate	Density	Weight %	Weight %	Weight %	Volume %	Volume %	Gal of Mat	Maximum	Pounds VOC	Pounds VOC	Potential	Potential	Potential	Particulate	lb VOC	Transfer
	(lb/gal)	Volatile	Water	Organics	Water	Non-Vol	(gal/unit)	(unit/hour)	per gallon	per gallon	VOC pounds	VOC pounds	VOC tons	Potential	/gal	Efficiency
Material		(H20 &				(solids)			of coating	of coating	per hour	per day	per year	tons per year	solids	
		Organics)							less water							
NGR Stain (B-1)	6.68	98.16%	0.0%	98.2%	0.0%	1.14%	0.20	4.80	6.56	6.56	6.29	151.08	27.57	0.13	575.18	75%
SAP Stain (B-1)	6.63	99.20%	0.0%	99.2%	0.0%	0.47%	0.20	4.80	6.58	6.58	6.31	151.53	27.65	0.06	1399.35	75%
Toner Stain (B-1)	6.67	98.60%	0.0%	98.6%	0.0%	0.80%	0.20	4.80	6.58	6.58	6.31	151.53	27.65	0.10	822.08	75%
Washcoat (B-2)	7.07	87.60%	0.0%	87.6%	0.0%	8.20%	0.38	4.80	6.19	6.19	11.30	271.12	49.48	1.75	75.53	75%
Lacquer (B-2)	8.44	55.78%	4.5%	51.3%	2.2%	36.45%	0.38	4.80	4.43	4.33	7.89	189.46	34.58	7.45	11.87	75%
Wiping Stain (B-3)	7.71	72.40%	2.7%	69.8%	2.7%	15.75%	0.11	4.80	5.53	5.38	2.84	68.15	12.44	1.23	34.14	75%
Filler (B-3)	13.98	19.49%	3.6%	15.9%	6.0%	60.59%	0.11	4.80	2.37	2.22	1.17	28.19	5.14	6.51	3.67	75%
Sealer (B-4)	7.68	70.00%	0.0%	70.0%	0.0%	21.50%	0.46	4.80	5.38	5.38	11.87	284.88	51.99	5.57	25.00	75%
Lacquer (B-4)	8.44	55.78%	4.5%	51.3%	2.2%	36.45%	0.46	4.80	4.43	4.33	9.56	229.35	41.86	9.02	11.87	75%
Shade (B-4)	6.96	91.30%	0.0%	91.3%	0.0%	5.81%	0.46	4.80	6.35	6.35	14.03	336.74	61.45	1.46	109.37	75%
Solvents and Thinner (All)	7.11	99.36%	0.0%	99.4%	0.0%	0.64%	0.03	4.80	7.06	7.06	1.02	24.41	4.46	0.00	1103.83	100%
Black Lacquer (B-5)	7.47	71.90%	0.0%	71.9%	0.0%	20.90%	0.18	4.80	5.37	5.37	4.64	111.37	20.33	1.99	25.70	75%
								PM Con	rol Efficiency:	0.95						
-	·					·	·	3	Worst	-Case TOTAL:	70.6	1695	309	35.1		·
				Controlled Emissions:										1.76		

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % MEK	Weight % MIBK	Weight % Glycol Ethers	Weight % Methanol	Weight % Methylene	Xylene	Toluene	Formaldehyde	MEK	MIBK	Glycol Ethers	Methanol	Methylene chloride
											chloride	Emissions	Emissions	Emissions	Emissions	Emissions	Emissions	Emissions	Emissions
												(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
NGR Stain (B-1)	6.68	0.20	4.80	0.00%	0.00%	0.00%	0.00%	0.00%	7.00%	93.00%	0.00%	0.00	0.00	0.00	0.00	0.00	1.97	26.12	0.0
SAP Stain (B-1)	6.63	0.20	4.80	0.00%	0.00%	0.00%	0.00%	0.00%	6.00%	94.00%	0.00%	0.00	0.00	0.00	0.00	0.00	1.67	26.21	0.0
Toner Stain (B-1)	6.67	0.20	4.80	0.00%	0.00%	0.00%	0.00%	0.00%	6.00%	94.00%	0.00%	0.00	0.00	0.00	0.00	0.00	1.68	26.36	0.0
Washcoat (B-2)	7.07	0.38	4.80	0.00%	17.00%		19.00%	0.00%	0.00%	0.00%	0.00%	0.00	9.60	0.11	10.73		0.00	0.00	0.0
Lacquer (B-2)	8.44	0.38	4.80	5.00%	8.00%	0.30%	5.00%	2.00%	0.00%	0.00%	0.00%	3.37	5.39	0.20	3.37	1.35	0.00	0.00	0.0
Wiping Stain (B-3)	7.71	0.11	4.80	0.00%	7.00%	0.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00	1.25	0.00	0.00	0.00	0.89	0.00	0.0
Filler (B-3)	13.98	0.11	4.80	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00%	0.00	0.00	0.00	0.00		0.32	0.00	0.0
Sealer (B-4)	7.68	0.46	4.80	2.00%	8.00%	0.00%	15.00%	0.00%	0.00%	0.00%	0.00%	1.49	5.94	0.00	11.14	0.00	0.00	0.00	0.0
Lacquer (B-4)	8.44	0.46	4.80	5.00%	8.00%	0.30%	5.00%	2.00%	0.00%	0.00%	0.00%	4.08	6.53	0.24	4.08		0.00	0.00	0.0
Shade (B-4)	6.96	0.46	4.80	0.00%	17.00%	0.00%	21.00%	0.00%	0.00%	37.00%	0.00%	0.00	11.44	0.00	14.14	0.00	0.00	24.90	0.0
Solvents and Thinner (All)	7.11	0.03	4.80	0.00%	11.00%		28.00%	6.00%		100.00%	87.00%	0.00	0.49	0.00	1.26		0.00		3.9
Black Lacquer (B-5)	7.47	0.18	4.80	5.00%	8.00%	0.30%	5.00%	2.00%	0.00%	0.00%	0.00%	1.41	2.26	0.08	1.41		0.00	0.00	0.0
										TOTALS:	(tons/yr):	10.4	42.9	0.645	46.1	3.82	3.18	55.8	3.9
									OVER	ALL TOTAL:	(tons/yr):	167							

#### METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal)\*Weight % Organics)/(1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (b/ga)\* Call of Material (gal/unit)\* Maximum (units/h)\* (8760 hr/y)\* (1 ton 2000 bs)
Particulare Potential Tons per Year = (units/houn\*)\* (gal/unit)\* (b/sg/gi)\* (1-1 Vegir)\* (1-1 Transfer efficiency)\* (9760 hrs/y)\* (1 ton 2000 bs)
Pounds VOC per Gallon of Solida\*, Cleratly (b/sg/gi)\* (Vegir)\* (organis/) (Volume % solid)\* (Vol

Total = Worst Coating + Sum of all solvents used

HAPS emission rate (tons/yr) = Density (Ib/gal)\* Call of Material (gal/unit)\* Maximum (unit/hr)\* Weight % HAP\* 8760 hrs/yr\*1 ton/2000 lbs NOTE: Worst Case toxics; percentage HAPs may come from different material categories.

### Appendix A: Emission Calculations Baghouse Operations

Company Name: Styline Industries, Inc.

Address City IN Zip: Styline Plant #7 114 East Third Street, Huntingburg, IN 47542

FESOP: F 037-13920 Plt ID: 037-00079

Reviewer: Paula M. Cognitore Date: February 14, 2001

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)		Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
	99.9%	0.0000335	17400.0	5.00	21.9	0.005	0.022
Allowable	99.9%	0.0300000	17400.0	4474.29	19597.4	4.474	19.597

#### Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains) Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency) Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Allowable PM emission rate of 0.3 grains per dry standard cubic foot of exhaust air pursuant to 326 IAC 6-1